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 And NP Red Rock LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSHUA HUSOK,)	Case No.: 2:20-cv-01939-KJD-DJA
Plaintiff,)	
)	STIPULATION AND ORDER TO
vs.)	EXTEND SCHEDULING ORDER
)	DEADLINES
)	(Eighth Request)
STATION CASINOS, LLC, a Nevada)	
Limited Liability Company; NP RED)	
ROCK, LLC, d/b/a RED ROCK)	
CASINO, RESORT AND SPA, a)	
Nevada Limited Liability Company;)	
ROE Business Organizations I-X; and)	
DOE INDIVIDUALS I-X, Inclusive,)	
)	
Defendants.)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	August 5, 2022
Dispositive Motion Deadline	September 6, 2022
Joint Pretrial Order	October 6, 2022, or 30 days from the ruling on a dispositive motion

This is the eighth request for an extension of these deadlines. The parties provide the following information regarding the proposed extension of the discovery deadline.

Discovery Completed to Date

The parties have served their Initial Disclosures and supplements thereto. Defendants have served interrogatories and requests for production and Plaintiff has responded. Plaintiff has served two sets of interrogatories and two sets of requests for production and Defendants have responded. Jennifer Johnson has been deposed. Rita Oliveri and Kiernia Jimenez-Milan were deposed June 28, 2021. Plaintiff was deposed on July 12, but his cross-examination was postponed because Plaintiff's counsel had a flare-up of a medical condition that caused the deposition to stop. Antonio Nunez was deposed September 13. Tia Campbell and Betty Martin were deposed September 15. Nyemma Demmons was deposed September 22. Erika Hernandez and Sammy Flores were deposed October 19. Stacy King was deposed October 21. Plaintiff's deposition was concluded on October 25. Elizabeth Alva and Guicela Alva were deposed January 10, 2022. The deposition of Zezy Farfan started on January 11, but it had to be postponed (for reasons discussed in prior submissions). Michelle Cortes was deposed March 2. Farfan was deposed April 22.

Remaining Discovery to Be Completed

Plaintiff's Rule 30(b)(6) deposition topics and possibly other limited discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

The Court may recall that the parties have agreed to consolidate discovery in this case with discovery in the somewhat related case of *Farfan v. Station Casinos LLC et. al.* (Case No. 2:20-cv-01516-JAD-NJK), which requires additional time to prepare for and take each deposition.

The parties have been grappling with Rule 30(b)(6) issues, but working amicably towards resolution, hopefully without court intervention. While trying to work through these issues without the involvement of the Court, counsel for the parties have had the usual assortment of hearings, depositions, briefs and appellate work in other matters. Defense counsel has not been able to focus on this case much in recent weeks because he had an *en banc* oral argument before the Nevada Supreme Court on May 16, 2022 in a case of first impression, was out-of-state from May 26 through June 2, and prepared a 68-page Answer in a case involving 76 plaintiffs for filing on June 6 (which involved dozens of hours of work).

Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of August 5, 2022.

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IT IS SO ORDERED:



 UNITED STATES MAGISTRATE JUDGE

Dated: June 10, 2022

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